

the studios, in order to feed test signals to the transmitter to assist Mr. McVey in his work. He returned to the studios shortly after 1:30 a.m., returning the modulation monitors to their rack, and setting the levels from the board to the STL. He finished his work and left about 3:30 a.m. Our conversation concerning Eldon, as described in my earlier affidavit, occurred at the KKMI studios prior to our going to the transmitter -- that is, between 10 and 11:15 p.m. -- not at 3 a.m. as he claims. Thus, there is no basis for his attempt to attribute a "misinterpretation" on my part to the "late hour."

6. Mr. McVey claims (page 2) to recall, in this "early morning conversation . . . Mr. Brown stating that he and Mr. Pritchard were interested in purchasing KKSI-FM from O-Town Communications." I made no such statement. A week earlier, on January 11, Mr. McVey had called me, and asked whether Mr. Pritchard or I might be interested in purchasing KKSI: I had responded (on January 11) that I was not personally interested, noting my Eldon application, and that I would inquire of Mr. Pritchard as to his possible interest. On January 18, Mr. McVey asked if I had determined whether Mr. Pritchard was interested in pursuing KKSI; I responded that I had mentioned the subject to Mr. Pritchard, but that he had not indicated to me whether he was interested in buying KKSI or not. There was no mention of "LMAs" during our conversation of January 18, either generally or specifically as to KKSI and an Eldon station, contrary to Mr. McVey's claim.

7. With respect to our meeting of March 17, 1992 (which I described at paragraph 4 of my April 14 affidavit, and which Mr. McVey discusses at pages 3 and 4 of his Statement), it is correct that we met at my suggestion. It is not true that I suggested that Mr. McVey sell his interest in KKSI and join with Ms. Sample and myself in a merged Eldon application, as he claims: Since I had never met or spoken with Ms. Sample at that point, there was no basis for me to either consider merging with her, nor to assume that she had an interest in merging with me, much less to propose that Mr. McVey join in such a merged applicant. There simply was no discussion remotely resembling that described by Mr. McVey. The only mention of a possible sale of his interest in KKSI was in the context of a possible purchase of KKSI by Mr. Pritchard (who, since the January meeting discussed above, had actually approached the Linders to determine what they wanted for KKSI). Mr. McVey stated that if Mr. Pritchard were to buy KKSI, he (McVey) would want to pursue an investment in an application for Albia, Iowa, which was then pending.

8. I did mention to Mr. McVey on March 17 that I was no longer working at KKMI (March 13 was my last day there), but I don't know what I might have said to give him the "impression" that Mr. Pritchard and I "had a falling out," as he claims. In fact, there has been no such "falling out," and Mr. Pritchard and I remain good friends.

9. Turning to Ms. Sample's Statement, it is correct that she and I met on the evening of March 17. That meeting lasted for about twenty-five minutes, and was the first and only time

that I have met her. I told her at that time that I hoped that she and could work something out which would avoid the necessity for a hearing on our applications, and the expense which that would involve, but I made no specific suggestion: I did not specifically suggest a merger, as she claims, although that would be an obvious possibility for avoiding the time and expense of a hearing. She asked if I might be interested in working for the Eldon station if she were to be awarded it, and I was non-committal. It is correct that there was no discussion of LMAs or any synergism between KKSI and Eldon during that brief meeting.



David W. Brown

Subscribed and sworn to before me, a Notary Public, this 6th day of May, 1992, by David W. Brown.

(SEAL)



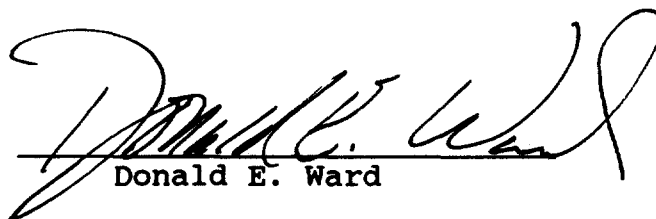
CERTIFICATE OF SERVICE

I, Donald E. Ward, do hereby certify that I have this 24th day of February, 1993, caused to be served by hand a copy of the foregoing "MOTION TO ENLARGE ISSUES" to the following:

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